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Ramon K. Quichocho, Esq.
LAW OFFICES OF RAMON K. QUICHOCHO, LLC
2nd Floor, V.S. Sablan Building, Chalan Piao
P.O. Box 505621
Saipan, MP 96950
Tel. No.: 670.234.8946
Fax: 670.234.8920
Email: rayq@vzpacifica.net

For The Northern Mariana Islands
By _____
(Deputy Clerk)

Attorney for Defendant MPLA

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

ANTONIO S. CAMACHO,

CASE NO. CV05-0043

Plaintiff,

vs.

**COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS, MARIANAS PUBLIC
LANDS AUTHORITY, successor to the
Marianas Public Lands Corporation, and
DEPARTMENT OF PUBLIC WORKS,**

**ANSWER AND
AFFIRMATIVE DEFENSES**

Defendants.

COMES NOW Defendant Marianas Public Lands Authority (MPLA), by and through
counsel, Ramon K. Quichocho, Esq., and answers the Complaint as follows:

**I.
INTRODUCTION**

1. MPLA is without knowledge or information sufficient to form a belief as to the truth
of the allegations in paragraph 1 of the Complaint, and on that basis, MPLA denies each and
every allegation contained therein.

**II.
JURISDICTION AND VENUE**

2. MPLA denies the allegations in paragraphs 2 and 3 of the Complaint.

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**III.
PARTIES**

3. MPLA admits the allegations in paragraphs 4, 5, 6, and 7 of the Complaint.

**IV.
FACTUAL ALLEGATIONS**

4. MPLA is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 8, 9, 10, 11, 13, 16, and 17 of the Complaint, and on that basis, MPLA denies each and every allegation contained therein.

5. MPLA admits paragraphs 12, 14, and 15 of the Complaint.

**V.
FIRST CAUSE OF ACTION
(violation of constitutionally protected rights)**

6. In response to paragraph 18 of the Complaint, MPLA re-alleges and incorporates, by this reference, MPLA's answers to paragraphs 1 through 17 of the Complaint, as if set forth in full.

7. MPLA is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 19, 20, 21, and 22 of the Complaint, and on that basis, MPLA denies each and every allegation contained therein.

**VI.
SECOND CAUSE OF ACTION
(common-law conversion)**

8. In response to paragraph 23 of the Complaint, MPLA re-alleges and incorporates, by this reference, MPLA's answers to paragraphs 1 through 17 of the Complaint, as if set forth in full.

9. MPLA is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 24, 25, and 26 of the Complaint, and on that basis, MPLA denies each and every allegation contained therein.

GENERAL DENIALS

10. Defendants deny generally and specifically all other allegations not previously denied or admitted.

AFFIRMATIVE DEFENSES

Defendant MPLA asserts the following affirmative defenses:

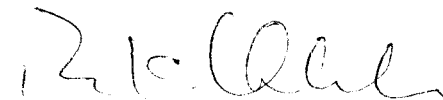
- a. Plaintiff's Complaint against MPLA fails to state a claim upon which relief can be granted;
- b. Plaintiff's Complaint against MPLA is barred due to failure of consideration;
- c. Plaintiff failed to exhaust available administrative remedies at MPLA as required by the Land Compensation Act of 2002, and therefore, the Court lacks jurisdiction over MPLA;
- d. Plaintiff's Complaint fails to state a cause of action against MPLA.

PRAYER

WHEREFORE, Defendant MPLA prays that Plaintiff take nothing from MPLA under Plaintiff's Complaint; that MPLA be awarded reasonable attorneys fees and costs incurred herein; and that MPLA be awarded such other and further relief under law and in equity as the Court deems just.

Respectfully submitted this 9th day of February, 2006.

LAW OFFICES OF RAMON K. QUICHOCHO, LLC



Ramon K. Quichocho
Attorney for Defendant MPLA